

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

---

ESTATE OF ALVIN COLE, et al.,

Plaintiff,  
v.

Case No. 22-CV-0856

JOSEPH ANTHONY MENSAH,

Defendant.

---

**DEFENDANT'S PROPOSED SPECIAL VERDICT FORM**

---

We, the jury, duly impaneled and sworn, for our special verdict in the above-entitled action, find as follows:

**EXCESSIVE FORCE**  
(see Part \_\_, Section \_\_ of the Jury Instructions)

**Question No. 1:** Did the Plaintiffs prove by a preponderance of the evidence that the amount of force used by Officer Joseph Mensah against Alvin Cole on February 2, 2020, exceeded what a reasonable police officer would have used under similar circumstances?

Answer: \_\_\_\_\_  
(Yes/No)

**SPECIAL INTERROGATORY**

At the time of Officer Joseph Mensah's use of force on February 2, 2020, did he reasonably believe, even if he was mistaken, that Alvin Cole posed an imminent threat of serious harm to himself or others?

Answer: \_\_\_\_\_  
(Yes/No)

**DAMAGES**  
(see Part \_\_, Section \_\_ of the Jury Instructions)

If and ONLY if you answered Question No. 1 "Yes," then and only then answer this question:

**Question No. 2:** What amount of money, if any, do you award to fairly and reasonably compensate Alvin Cole's Estate for the force used by Defendant Mensah?

**Answer:** \$\_\_\_\_\_

**LOSS OF SOCIETY AND COMPANIONSHIP**  
(see Part \_\_, Section \_\_ of the Jury Instructions)

If and ONLY if you answered Question No. 1 "Yes," then and only then answer this question:

**Question No. 3:** Did Officer Mensah use excessive force against Alvin Cole with the specific purpose and intent to deprive Tracy and Albert Cole of the society and companionship of Alvin Cole?

Answer: \_\_\_\_\_  
(Yes/No)

**DAMAGES**  
(see Part \_\_, Section \_\_ of the Jury Instructions)

If and ONLY if you answered Question Nos. 1 and 3 "Yes," then and only then answer this question:

**Question No. 4:** What amount of money, if any, do you award to fairly and reasonably compensate Tracy and Albert Cole for the loss of Alvin Cole's society and companionship?

**Answer:** \$\_\_\_\_\_

Dated at Milwaukee, Wisconsin this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

---

Foreperson